

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JENNIFER VANDERSTOK, *et al.*,

Plaintiffs,

and

BLACKHAWK MANUFACTURING GROUP,
INC.,

Intervenor-Plaintiff,

Civil Action No. 4:22-cv-00691-O

v.

MERRICK GARLAND, in his official
capacity as Attorney General of the United States;
et al.,

Defendants.

**PLAINTIFFS' NOTICE REGARDING THE COMPLETENESS OF THE
ADMINISTRATIVE RECORD**

Plaintiffs Jennifer VanDerStok; Michael G. Andren; Tactical Machining, LLC; and Firearms Policy Coalition, Inc. hereby notify this Court that they do not presently intend to file a motion to supplement the Administrative Record in this matter. The Record contains sufficient information to complete supplemental briefing pursuant to Rule 65(a)(2) consolidation regarding Plaintiffs' Count I statutory authority claim.

Plaintiffs and Defendants are working through informal conferrals to address questions as to the Record, including a lack of privilege log and referenced materials, such as Microsoft Teams chats, that may be relevant to Plaintiffs' other claims. Plaintiffs proposed a stipulation to Defendants extending the established deadline to file a motion to supplement the record for Plaintiffs' Counts II–VII but also allowing supplemental Count I briefing for the Rule 65(a)(2)

consolidation to proceed on schedule. Defendants agreed to the proposed extension but declined Plaintiffs' specification that supplemental briefs for Count I need not be delayed.

Given that this Court has sought to complete supplemental briefing on an expedited schedule, and Defendants recently filed an interlocutory appeal, Plaintiffs do not wish to delay supplemental briefing unnecessarily. Moreover, Plaintiffs do not believe any additional factual documents in the Record would aid Plaintiffs, Defendants, or this Court in addressing the question of Defendants' statutory authority. Plaintiffs are hopeful that Defendants will continue to work in good faith to produce any documents that may be improperly missing from the Record and relevant to Plaintiffs' Counts II–VII.

DATED this 14th day of November 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on November 14, 2022, a true and correct copy of the foregoing document was served via the Court's CM/ECF system to all counsel of record.

/s/ Cody J. Wisniewski

Cody J. Wisniewski

FIREARMS POLICY COALITION